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Full copies of responsive papers should be served on plaintiff's counsel and on the Court. Papers are to be treated as confidential until further Court order. Redacted copies should be available publicly. The time to reply is extended until March 9, 2020. SO ORDERED.

New York, NY March 5, 2020 us

11 Broadway, Suite 715 New York, New York 10004 (212) 943-1253 Telephone (212) 943-1238 Facsimile

Via ECF Hon. John G. Koeltl Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

RE: Index No.: 1:20cv01757 (JGK);

EFT Services LLC, and IPN LLC d/b/a Paybotic v. i-POS Systems, LLC d/b/a Dejavoo,

March 4, 2020

and DeNovo Systems, LLC



Malecki Law along with Global Legal Law Firm represents Defendant, i-POS Systems LLC d/b/a Dejavoo, and DeNovo Systems, LLC, (collectively "Defendants") in the above-captioned action. Defendants respectfully move this Court for an Order Granting Defendants the right to file under seal and unredacted version of Defendants Response to the Order to Show Cause for Temporary Restraining Order and Preliminary Injunction (the "Response") as certain sections of the response and the declarations in support of the Response contain confidential and potentially inculpatory information related to all parties.

The Response outlines the February 28, 2020 Injunctive Order cannot continue Plaintiffs use of the licenses at issues violates applicable regulations. Defendant is hesitant to expose these violations to the public as it may inculpate third parties in addition to Plaintiffs.

Defendant intends to file a redacted version of their Response by March 4, 2020. Accordingly Defendants respectfully request leave to file a complete copy of the Response under seal pursuant to Fed. R.Civ. P. 5.2(d), Local Civil Rule 5.2(b) and Individual Practices of the Court Rule 1(a), so that the Court may view a full and complete copy of Defendants response to the Order to Show Cause.

By:

Jenice L. Malecki

Cc: Charles M Miller, Esq. and Richard C, Schoenstein, Esq.